

# **EXHIBIT 15**

STATE OF MICHIGAN

IN THE 49th CIRCUIT COURT FOR THE COUNTY OF OSCEOLA

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UUSI, LLC, and NORMAN RAUTIOLA,  
Plaintiffs,

v

File No. 16-14662-CK

LOREN STIEG, S&S INNOVATIONS CORPORATION,  
and TATTLER REUSABLE CANNING LIDS, LLC,  
Defendants.

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JURY TRIAL

VOLUME II OF IV

BEFORE THE HONORABLE SCOTT HILL-KENNEDY, CIRCUIT JUDGE

Reed City, Michigan - Wednesday, October 10, 2018

1 (At 2:48 p.m., Defendants' Exhibit J is  
2 admitted)

3 BY MR. WOTILA:

4 Q Did you cause to be opened by March 27, a bank account at  
5 Huntington Bank, in Reed City, Michigan, an account under  
6 the name of Tattler Home Products?

7 A I believe so.

8 Q And was your name on that account?

9 A Probably.

10 Q And was Heather Huber's name on that account?

11 A Probably.

12 Q But, Mr. Stieg's name wasn't on the bank account was it?

13 A No, he had nothing to do with Tattler Home Products.

14 Q And, yet, they're selling the lids?

15 A Selling lids, yes.

16 Q Thank you.

17 A Definitely selling lids.

18 Q Mr. Rautiola, we've noted many times the letter sent on  
19 March -- I'm sorry -- May 22, 2014, telling Mr. Stieg not  
20 to come back on the premises, fair enough, May 22nd, 2014?

21 A Yeah, I remember the letter. I think it's right there.

22 MR. WOTILA: Thank you. I'm going to hand you  
23 what's already been marked as an exhibit. It's been  
24 marked as Plaintiffs' Exhibit, your exhibit, Number 4.

25 THE COURT: Marked and admitted.

1 Q They're not being manufactured -- I'm using the word  
2 manufactured -- produced under the name of S&S  
3 Innovations, are they?

4 A Ask me the question again, please.

5 Q You continue to make the canning lids there at Nartron?

6 A Yes.

7 Q And you make them and are producing them under the name of  
8 Tattler Home Products?

9 A Yes.

10 Q In 2014, did Tattler Home Products prepare, in the course  
11 of business, any profit or loss statements regarding the  
12 canning lids, Tattler Home Products?

13 A We prepared, at some point, at the request of you, to  
14 declare the sales and profits of that product.

15 Q Yes. So, let me go to the question. In 2014, in the  
16 normal course of business, were records -- was any profit  
17 and loss statement produced --

18 A No.

19 Q -- regarding Tattler Home Products?

20 A No.

21 Q In 2015, were any profit or loss statements prepared at  
22 the Nartron facility for the canning lids made by Tattler  
23 Home Products?

24 A No.

25 Q In 2016, were any such documents prepared and kept in the

1           happened?

2   A     Wait, wait, wait. Just because somebody -- so -- you're  
3         suggesting to your audience that there is one or two  
4         people that are the targets to sell something. And I'm  
5         going to hire two of my own people to sell this target.  
6         And Stieg's got one target to sell. That's not how it  
7         works, no.

8   Q     I didn't think I said that. Let me go ahead --

9   A     You were suggesting that.

10   Q    -- and explain -- okay.

11   A     You're suggesting that either or.

12   Q     Let me clarify.

13   A     Either or.

14   Q     Please clarify what --

15   A     I think you are misleading.

16   Q     If I was misleading, you have the floor, please clarify  
17         what I mislead you on.

18   A     What's the question?

19   Q     Didn't Mr. Stieg come to work and find out that people had  
20         been hired to take his place in sales?

21   A     No.

22   Q     Didn't you --

23   A     There was nobody hired to take his place or his wife's  
24         place. But there were people hired to secure a purchase  
25         order on behalf of Tattler Home Products. Big difference.